

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF N.V.

DECLARATION OF N.V.
NO. 2:25-cv-00244-LK

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

DECLARATION OF N.V.

I, N.V., declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and I make this declaration based on my personal knowledge.

2. I live in Hennepin County, Minnesota with my spouse and our children.

3. One of my children is transgender. He was assigned female sex at birth, but his gender identity is male.

4. My son currently takes testosterone under the supervision of medical providers.

5. My son had top surgery consultation scheduled for June 2025 at a Minnesota medical clinic. The top surgery procedure had been approved by my son's gender health provider, his psychiatrist, as well as his therapist. Our health insurance had also approved the procedure.

6. On or around February 6, 2025, shortly after the Executive Order banning gender affirming healthcare for minors was published, I received a call from the medical clinic cancelling my son's top surgery consultation.


7. I was told that his consultation was cancelled because the surgeon was no longer scheduling gender affirming surgical consults for people under the age of 18. When I asked why the clinic was no longer scheduling consults for minors, I was told it was "because of everything going on around us."

8. Based on the conversation I had with the clinic I believe my son's surgical consultation was cancelled because of Executive Order 14187.

9. I have decided to use initials in this declaration to protect my son and my family from any acts of hatred or violence. I am concerned about what could happen to my son if my name was made public when speaking out in response to the Executive Order.

1
2 I declare under penalty of perjury that the foregoing is true and correct.

3 DATED this 18th day of February 2025, in Hennepin County, Minnesota.

4
5 
6 NV (Feb 18, 2025 18:45 CST)
7 N.V.